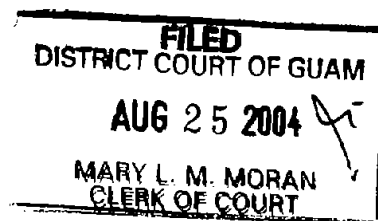


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The Estate of Olimpio Montoya,
by and through Alfredo Espiritu
Montoya, Special Administrator;
Andrea Montoya, Surviving Spouse;
Raymundo E. Montoya, Josefina Aguilar,
Bayanie Montoya, Julieta M. Reyes,
Alfredo Espiritu Montoya and Oliver Montoya;
Surviving Children

IN THE DISTRICT COURT OF GUAM

The Estate of Olimpio Montoya,
by and through Alfredo Espiritu
Montoya, Special Administrator;
Andrea Montoya, Surviving Spouse;
Raymundo E. Montoya, Josefina Aguilar,
Bayanie Montoya, Julieta M. Reyes,
Alfredo Espiritu Montoya and Oliver Montoya;
Surviving Children,

CIVIL CASE NO. CV04-00018

Plaintiffs,

DISCOVERY PLAN

vs.

CONTINENTAL AIRLINES, INC.;
CONTINENTAL MICRONESIA INC.;
and DOE Insurance Companies
I through V,

Defendants.

DISCOVERY PLAN

Pursuant to Rule 26 (f) of the Federal Rules of Civil Procedure and Local Rule
16.2, the parties agree to and hereby submit the following plan:

Montoya, et. al. v. Continental Airlines, Inc., et. al
Discovery Plan
June, 2004

A. Depositions of fact witnesses may begin at once and be taken as needed, prior to the discovery cutoff date. The parties may call expert witnesses in this case.

B. Unless additional discovery is ordered by the Court, the parties also may propound a maximum of 25 of interrogatories and 25 requests for admissions. There shall be no limit on the number of Requests for Production. This discovery shall be served in such a fashion as to be subject to answer or response on or before the discovery cutoff date.

C. The parties, except as otherwise noted, agree to provide all pre-discovery and preliminary discovery mandated by Local Rules and FRCP Rule 26 by 90 days from the date of this Discovery Plan. Compliance with mandatory disclosure as is set forth in Rule 26 (a) (1) is on-going.

D. All parties will exchange names and reports (if any) of expert witnesses on or before April 1, 2005.

E. The specific subjects on which discovery may be needed are:

Facts supporting the nature of the claims and defenses.

F. Other than the provisos set forth above in Item B, the parties do not anticipate requiring any other changes or limitations on discovery as imposed under the Federal and Local Rules.

G. The Cutoff date for discovery is May 6, 2005.

APPROVED AS TO FORM AND CONTENT:

LAW OFFICES OF GORMAN & GAVRAS

Date: June 21, 2004.

for BY: 

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Alfredo Espiritu Montoya and Oliver Montoya;
Surviving Children

LAW OFFICES OF CARLSMITH BALL LLP.

Date: June 21, 2004.

BY: 

DAVID LEDGER, ESQ.
Attorneys for Defendants
CONTINENTAL AIRLINES, INC.;
CONTINENTAL MICRONESIA INC.;

